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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH PAUL HERRERA KINNEY,

Defendant.

CASE NO. 2:23-CR-00318-DC

STIPULATION TO CONTINUE SENTENCING
AND RESET PSR BRIEFING SCHEDULE, AND
~~PROPOSED~~ ORDER

COURT: Hon. Dena Coggins

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This matter is currently set for Judgment and Sentencing on July 11, 2025. The Court is no longer available on July 11. Accordingly, the parties jointly request that the Court continue the sentencing hearing to September 19, 2025. The assigned probation officer is available that day.

2. In addition, the parties request that the Court reset the PSR schedule as follows:

- a) Draft PSR Due: August 1, 2025 (at least six weeks before J&S)
- b) Informal Objections Due: August 8, 2025 (at least four weeks before J&S)
- c) Final PSR Due: August 22, 2025 (at least three weeks before J&S)
- d) Formal Objections Due: September 5, 2025 (two weeks before J&S)
- e) Opposition to Objections: September 12, 2025 (one week before J&S)

f) Judgment and Sentencing: September 19, 2025

IT IS SO STIPULATED.

Dated: May 20, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ JUSTIN L. LEE

JUSTIN L. LEE
Assistant United States Attorney

Dated: May 20, 2025

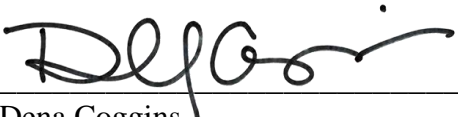
/s/ HOOTAN BAIGMOHAMMADI
HOOTAN BAIGMOHAMMADI
Counsel for Defendant
JOSEPH PAUL HERRERA KINNEY

ORDER

The court, having received, read and considered the parties' stipulation and good cause appearing therefrom, ADOPTS the parties' stipulation. Accordingly, the Sentencing Hearing scheduled for July 11, 2025, at 9:30 a.m. is VACATED and RESET for September 19, 2025, at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins to allow the parties time to complete the Presentence Investigation Report briefing.

IT IS SO ORDERED.

Dated: May 21, 2025


Dena Coggins
United States District Judge